

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,  
Plaintiffs,**

**v.**

**BRAD RAFFENSPERGER, ET AL.,  
Defendants.**

**DECLARATION OF LOUIS M.  
FRANZONI, JR. IN SUPPORT  
OF CURLING PLAINTIFFS'  
MOTION FOR PRELIMINARY  
INJUNCTION**

**Civil Action No. 1:17-CV-2989-AT**

LOUIS M. FRANZONI, JR., declares, under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. My name is Louis M. Franzoni, Jr. (“Chip”). I have personal knowledge of the facts in this declaration and, if called to testify as a witness, I would testify under oath to these facts.

2. I reside and am currently registered to vote in Fulton County, Georgia.

3. I served for four years on the DeKalb County school board, including two years by appointment and two years by election. Currently, I work as a relator.

4. I arrived at my designated voting precinct, located at Samuel Inman Middle School, on June 9, 2020. My wife and I were forced to vote in person when

the absentee ballots we requested through the Georgia Secretary of State website failed to arrive (despite confirmation stating otherwise).

5. I understood that my precinct had scheduled to open at 7:00 a.m. I arrived early—before 6:20 a.m. When my wife and I joined the line, there were seven individuals in front of us.

6. As planned, we were allowed to enter the precinct at 7:00 a.m. Each voter was handed a yellow voting card and told to use it to vote on one of the ballot marking devices.

7. The process quickly broke down, however. None of the seven individuals ahead of us were able to cast their votes. None of the yellow voting cards appeared to be working. After much confusion and no progress, the poll workers in our precinct began rebooting the voting machines at 7:30 a.m.

8. By 7:40 a.m., only one vote had been cast. The poll workers began steering all the voters to the single voting machine that had successfully cast a ballot. But neither I nor my wife could cast our votes on that machine.

9. In fact, the malfunctions were so severe that my wife sought to vote with a hand marked paper ballot. She soon learned that the process to receive a hand marked paper ballot is extremely onerous requiring multiple phone calls and

approvals—all in spite of the fact that no machine could reliably cast votes. The lack of training among the poll workers made this process more difficult.

10. After multiple attempts, the poll workers were able to reprogram and activate my voting card. I was able to cast my vote at 7:55 a.m. I was the eighth person in line and I was the fourth person to cast my vote as others continued to struggle to cast theirs, including individuals who were previously ahead of me in line.

11. I found that the new voting system introduced a number of problems: staff were not well trained in the use the ballot marking devices; the ballot marking devices had a number of technical glitches; there was no obvious back up plan when the ballot marking devices failed; and overall the process to vote was too long, difficult, and chaotic, and left me with little confidence that my vote was reliably cast and counted.

I declare under penalty of the perjury laws of the State of Georgia and the United States that the foregoing is true and correct and that this declaration was executed this 19th day of August, 2020, in Atlanta, Georgia.



LOUIS M. FRANZONI, JR.